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MOUNTAIN COUNTIES WATER RESOURCES ASSOCIATION

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May 12, 1997

Mr. Lester Snow
Executive Director
CALFED Program
1416 Ninth St., Suite 1155
Sacramento, CA 95814

Re: Water Use Efficiency/Storage & Conveyance Document
Dated 3/20/97

Dear Mr. Snow:

The following comments are submitted on behalf of the Mountain Counties Water Resources Association (MCWRA), and it is hoped they will be considered although submitted after the deadline set for their filing with CALFED.

MCWRA's comments are specifically focused on the Storage and Conveyance aspect of the CALFED document.

The previous comments of MCWRA filed in this proceeding have addressed the unique geographic, demographic and economic characteristics of the region of our membership which is the Mother Lode of California. In quick recapitulation, we are located in the Foothills and Sierra Nevada; essentially our only realistic water supply option is on-stream storage; our population is relatively small and our ability to pay for new sources of water supply is very limited.

Those characteristics shape our comments on CALFED's Storage and Conveyance Document. We are in full agreement in this regard with the comments filed on this subject by the Regional Council of Rural Counties which object to CALFED's priority ranking of storage options which ranks new on-stream storage last, and expansion of existing on-stream storage as next to last in desirability. This ranking pre-judges an issue of critical importance to MCWRA. It is premature and inconsistent with the development of an environmental document.

We do not believe that CALFED has a basis at this point for ruling-out entire categories of facilities which could make a significant contribution to a Bay/Delta solution.

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MCWRA believes that selected upstream and on-stream storage facilities could offer a cost-effective and significant environmental benefit to the downstream problems of the Bay/Delta , while providing at the same time a solution to the water supply needs of the MCWRA region.

MCWRA is getting underway its own studies of its regional water resource needs and projects which might meet those needs, and which at the same time could provide water for downstream environmental needs such as those of the Bay/Delta. We hope to have the conclusions of these studies available within a time frame compatible with CALFED's schedule for evaluation of alternatives.

In conclusion we therefore ask that CALFED not establish a ranking system for storage options before it has all the information on the benefits of various storage projects of all characteristics.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Chris Williams".

Christopher D. Williams
Executive Director